

**IN THE
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND**

CHAMBER OF COMMERCE OF THE
UNITED STATES OF AMERICA,
et al.,

Plaintiffs,

v.

PETER FRANCHOT,

Defendant.

No. 21-cv-410-DKC

* * * * *

JOINT STATUS REPORT AND PROPOSED SCHEDULE

The parties jointly submit this status report and request that the Court adopt the litigation schedule set forth below.

1. The complaint was filed on February 18, 2021, and served on February 24, 2021.
2. On March 5, 2021, the Court granted defendant's consent motion to extend to April 16, 2021 the time for filing a response to the complaint. ECF 19 & 20. The extension was requested because the General Assembly was considering legislation (Senate Bill 787 and House Bill 1200) that would make material amendments to the statute challenged in the complaint.
3. On April 12, 2021, the General Assembly enacted Senate Bill 787.

4. In light of Senate Bill 787's passage and based on plaintiffs' representation that the bill's enactment necessitated the filing of an amended complaint, on April 14, 2021, defendant filed and the Court granted a consent motion requesting a further extension of his response date to and including April 30, 2021, and also requesting leave for the parties to submit a status report on or before April 30, 2021. ECF 21 & 22.

5. Since the granting of that consent motion, the parties' counsel have conferred and agreed to the following proposed schedule:

- a. On April 30, 2021, plaintiffs filed an amended complaint.
- b. Defendant's dispositive motion in response to the amended complaint will be filed on or before June 15, 2021.
- c. Plaintiffs' opposition to defendant's dispositive motion and their cross-motion for summary judgment will be filed on or before July 29, 2021.
- d. Defendant's reply in support of his dispositive motion and his opposition to plaintiffs' cross-motion for summary judgment will be filed on or before September 13, 2021.
- e. Plaintiffs' reply in support of their cross-motion for summary judgment will be filed on or before October 13, 2021.

WHEREFORE, the parties jointly request that the Court issue an order establishing the above schedule to which the parties have agreed.

Respectfully submitted,

/s/ Michael B. Kimberly

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April 30, 2021

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